| Order Instituting Rulemaking Into |) | |
|--|---|-------------|
| Implementation of Federal Communications |) | |
| Commission Report and Order 04-87, As It |) | R.04-12-001 |
| Affects The Universal Lifeline Telephone Service |) | |
| Program. |) | |
| |) | |

OPENING COMMENTS OF AT&T CALIFORNIA (U 1001 C) ON ASSIGNED COMMISSIONER'S RULING SETTING SCOPE OF PHASE 2

ANNA KAPETANAKOS DAVID DISCHER

> 525 Market Street, Rm. 2024 San Francisco, CA 94105 Ph: 415-778-1480

Ph: 415-7/8-1480 Fax: 415-543-0418

E-Mail: anna.kapetanakos@att.com

Attorneys for AT&T California

December 14, 2007

Pursuant to the instructions in the November 14, 2007 Assigned Commissioner's Ruling Setting Scope of Phase 2 ("Ruling") of the above captioned proceeding, Pacific Bell Telephone Company, doing business as AT&T California ("AT&T California"), submits these Comments.

I. INTRODUCTION

The Commissioner's Ruling identifies a number of long term solutions for improving the effectiveness and efficiency of California Lifeline. AT&T California supports considering each of those solutions further. Transitioning the program to a pre-qualification approach and eliminating the income-based criteria may offer significant benefits to the overall organization and administration of the program without losing or burdening participants. This can be accomplished if all modifications to California Lifeline are conducted under a well thought-out platform that allows customers a sufficient transition period in which to understand the magnitude and effect of each change. AT&T California hopes that the following recommendations assist the Commission in improving California Lifeline under Phase 2 of this proceeding.

II. <u>ISSUES IDENTIFIED IN THE ASSIGNED COMMISSIONER'S RULING FOR CONSIDERATION DURING PHASE TWO OF THIS PROCEEDING</u>

A. <u>Customer Pre-qualification</u>: Should the Commission revise California Lifeline to require customers to pre-qualify before being enrolled in the program?

The Commission should revise California Lifeline to require customers to pre-qualify before they are enrolled in the program. Based on data from Solix, approximately 50% of certification customers enrolled in Lifeline are deemed ineligible for benefits and are required to be re-graded off of the program. This is a substantially high volume of customers whose service must be re-graded and account backbilled. This results in millions of dollars in (a) liability to the customers deemed ineligible² and (b) administration costs associated with carriers' backbilling

¹ See Ruling, pp. 5-7.

² Backbilling is applied to applicants who are deemed ineligible, as well as those who fail to submit their applications on time. In accordance with General Order ("GO") 153, those applicants are removed from the program and backbilled despite their intent to re-enroll and attempt certification a second time.

process which is ultimately borne by the Fund³. Transitioning to a pre-qualification process would completely avoid these expenses.

Currently, a prospective Lifeline customer may initiate Lifeline service when he/she first establishes telephone service. In order to enroll in Lifeline, the customer need only represent to the customer representative that he/she is eligible under one of two eligibility criteria. When enrolling at this time, the customer receives immediate discounts on non-recurring and monthly service charges. If the customer is unsuccessful in certifying his/her eligibility, however, all actual discounts received to date must be reimbursed by the customer. As the Scoping Memo indicates, the backbilled amount could be substantial and quite burdensome to the customer. In some cases, AT&T California has seen customers with excessive backbilled balances simply disconnect their service. This is not the only hardships faced when a Lifeline customer is removed from the program due to his/her failure to qualify. Customers, carriers, the Commission, and Solix are confronted with additional burdens under the backbilling process:

- Customers experience significant confusion when suddenly receiving notification of their ineligibility and a backbilled balance representing all non-recurring costs and typically at least two months of recurring charges;
- Carriers, the Commission, and Solix receive and must respond to a substantial number of inquiries and/or complaints from customers who are unfamiliar or confused with the backbilling process; and
- Carriers are burdened with administrative costs associated with regrading a customer off of Lifeline and backbilling him/her for services already rendered.

AT&T supports modifying California Lifeline to require a customer to pre-qualify before enrolling in the program. Accordingly, rather than enroll in Lifeline up front, the prospective Lifeline customer would initiate regular service and inform the carrier of his/her interest in applying for Lifeline. Upon signing the customer up for regular service, 4 the carrier would send a

⁴ The prospective Lifeline customer would be required to pay regularly priced non-recurring and monthly recurring charges unless and until he/she is certified by Solix and the carrier enrolls the customer in Lifeline.

2

³ For AT&T California, the majority of the backbilling process is mechanized however there are costs associated with those accounts which require manual processing.

data-feed to Solix identifying him/her as a prospective applicant. Solix would forward the customer a Lifeline brochure describing the program and criteria, and application. The customer would then review the material, and if eligible, return a completed application to Solix for processing. For customers who were previously approved for Lifeline discounts within 30 days of the initiation of service, Solix would not forward them an application, but rather inform the carrier of their current status the following day via a data feed, as is done presently.⁵

Until Solix determines that the customer qualifies for Lifeline, the prospective customer will be required to pay tariffed rates for non-recurring and monthly service ⁶ and comply with the carrier's advance payment and/or deposit policy, if warranted. For those customers previously approved under Solix' database, their account would be changed to Lifeline rates and terms within approximately two days from when the customer established service, ⁷ well before receiving their first bill. For those customers who must complete and submit an application, determination of eligibility may take up to 7 weeks, depending on the customer's response time. ⁸ Once approved, the carrier changes their service to Lifeline service, applies the Lifeline discount as of the approval date, and credits the account with all applicable discounts on non-recurring charges.

This pre-qualification approach offers many benefits to the program:

- Customers are no longer at risk of being backbilled for a potentially sizeable debt should Solix determine that they are ineligible for Lifeline benefits;
- Process provides an incentive for customers to complete their applications promptly in order to commence discounts as soon as possible. With the program now using first class mail, Solix can potentially qualify a customer for Lifeline within 10-15 days from establishing service for those customers who submit their forms promptly;
- Carriers no longer re-grade customers from California Lifeline to regular service due to certification denials since Lifeline customers

_

⁵ GO 153, § 4.2.1

⁶ AT&T California allows its customers the option of paying non-recurring charges in three installments.

⁷ Carriers are required to change a Lifeline customer's status upon receipt of a decision from Solix. *See* GO 153, § 5.8.1.

⁸ In accordance with Appendix E of GO 153, customers have up to 44 days to return the completed form to Solix. Solix then has up to 7 days from receipt to process the application and make a final determination as to eligibility.

- are not enrolled in the program until certification is confirmed by Solix; and
- The fund will experience an overall decrease in administrative costs associated with multiple regrades. Currently, customers who fail to certify get re-graded off the program immediately and must re-enroll into the program before they may attempt to certify for Lifeline service a second time. In many cases, customers face multiple regrades of their account before finally securing benefits. With pre-qualification, the customer establishes regular service and will not see a change in his account unless and until certification is confirmed by Solix. As such, he could apply as many times as he wishes without experiencing multiple regrades.

The overwhelming costs and burdens imposed on customers, carriers, the Commission and the Fund over the last two years since modifying California Lifeline's certification processes, provides great incentive for transitioning to a pre-qualification approach. As recognized in the Commission's ruling, the burdens of backbilling ineligible customers far outweigh the short delays in enrollment inherent in a pre-qualification program.

B. <u>Lessons from other States</u>: How do other states use web-based systems and how can those systems be duplicated or adapted for future use in California?

AT&T California supports implementing a web-based system for customers interested in submitting application forms on line. Such a tool could expedite the certification process significantly allowing customers to qualify for California Lifeline benefits at a much quicker rate. This would diminish the length of time a customer must maintain regular service before deemed eligible for enrollment.

Illinois and Wisconsin administer pre-qualification programs that allow carriers to have a direct interface with government agency databases in order to confirm the customer's participation in a particular program. These systems permit carriers to confirm eligibility under the program-based criteria in real time while initiating the customer's service. The customer representative may qualify the customer for Lifeline discounts while on the phone with him/her and immediately enroll the customer for Lifeline service. While these systems allow many customers to enroll for Lifeline service on-line, there are some limitations. Neither system

accesses all government programs under which a customer may qualify for Lifeline. As such, if the customer participates in a government program not accessible under the system, the carrier cannot enroll the customer in Lifeline immediately. That customer will have to submit a written application and await confirmation of certification from the carrier before enrolling into the program. This creates a disparate treatment of Lifeline customers offering the advantage of immediate enrollment to one segment of customers. AT&T California does not support creating an interface system based on Illinois and Wisconsin's model.

Florida administers a web-based system¹⁰ that allows customers to submit an on-line application for program-based eligibility.¹¹ The customer submits the application on-line after initiating regular telephone service with his carrier.¹² The carrier accesses the customer's online application after it is posted to the website in order to confirm certification. Once certification is confirmed, the carrier enrolls the customer in Lifeline. Although this web-based system is convenient for customers, it requires carriers to manually search the website to enroll their customers in the program. AT&T California believes that implementing a similar, but more mechanized, process in California may help expedite the certification and verification processes and improve overall customer experience.

The web-based system should be implemented and administered by Solix. The customer should be able to access the system from Solix's website and submit an on-line application. The information on the application could then be uploaded into Solix's database immediately.

Carriers should then receive certification-approvals or denials through electronic data feeds the

⁹ These systems are not permitted to access certain agency databases because of the privacy policy of the particular agency.

¹⁰ See a description of the Lifeline program administered in Florida at

http://www.psc.state.fl.us/utilities/telecomm/lifeline/engbrochure.aspx. To access Florida's online application in English, go to: http://www.psc.state.fl.us/utilities/telecomm/lifeline/LifelinePDFs/ApplicationEnglish.pdf.

¹¹ Customers who seek to qualify under program-based criteria but do not have access to the internet may request a written application from their carrier by mail. Those customers return the completed application to their carrier by fax or mail for processing. Customers seeking to qualify under income-based eligibility are required to submit their applications and supporting income documentation to the Florida Office of Public Counsel ("FOPC") by fax or through the mail. The FOPC provides carriers with a list of all approved customers.

¹² The customer is required to provide his current telephone number and identify his service provider on the application.

next business day, as is done currently. For those customers who choose not to apply on-line, they would be able to submit an application by mail, as is done today.

C. <u>Lessons from other States</u>: Should California move to a strictly program-based eligibility and eliminate the current prong that allows participation in the program based on income level?

Modifying California Lifeline to a pure program-based criteria will significantly simplify the certification and verification processes for the customer, as well as the overall administration of the program. The customer need only complete and return a one-page application by identifying the government program he/she is a participant in and signing at the bottom. The customer would no longer have to take the additional steps of producing copies of sensitive income documentation with the certification form as is done when certifying under the income-based criteria. Solix will no longer be required to review each income-based application and accompanied documentation manually. The process of reviewing and approving certification will be fully automated since the program-based application is a single page that can be scanned. This should lead to a significant decrease in processing costs for Solix and, ultimately, the Fund. For the customer, it should translate to a quicker response time, as Solix will no longer expend time with manual reviews of income documentation.

Based on information provided by Solix, approximately 20% of applicants were certified under Lifeline's income-based criteria over the last few months. AT&T California believes that the number of customers eligible under program-based criteria is probably significantly higher. In Ohio's Lifeline program, customers may certify under either program or income based criteria. Since implementing the Federal Communications Commission Report and Order 04-87's requirement that all income-based customers prove their eligibility, the number of AT&T customers in Ohio qualifying under income-based criteria has diminished from 20% in 2004 to 4% in 2007. AT&T believes that California will likely see the same decrease eventually as customers recognize the convenience of certifying under a program-based criteria.

Through proper education and outreach, AT&T believes that California Lifeline can transition to a program-based criteria without losing eligible customers. Should the Commission eliminate the income-based criteria, it should do so over an extended transition period. During the transition period, Community Based Organizations ("CBO") and the Commission's marketing and outreach vendor can run a well-thought out campaign that will educate consumers and assist them with the new rules. Carriers can also include information regarding the program changes in their annual Lifeline notices. This program modification may also help CBO's reach out to customers traditionally eligible under the income-based criteria and sign them up for government programs that they may have been unaware of.

In order to retain California Lifeline's subscription rate in the instance the income-based criteria is eliminated, the Commission should also consider expanding the list of government programs under which an applicant may satisfy the program-based criteria in order to cast a wider net.

D. <u>Refinement in Customer Responses</u>: What additional steps should Solix take to deal with unscannable mail?

Before the Commission implemented a third party administrator, AT&T California's Direct Mail Direct Response ("DMDR") organization was responsible for administering California Lifeline's certification and verification processes. Based on DMDR's prior experience, AT&T California recommends the following solutions be put in place in order to avoid the unscannable-correspondence predicament faced by Solix:

- Place a second bar code under the signature line so that there is a second location on the application that Solix can access customer information from should a portion of the correspondence be damaged;
- Place the customer's telephone number in two locations on the application should the bar codes be unreadable. One location should be right under the customer signature. The DMDR typically called customers to inform them that their certification form was damaged and AT&T California would re-issue another form for the customer to sign and return.
- Add bold language to the bottom of the certification form instructing customers that the entire form must be returned.

In order to offer a viable solution for Solix, AT&T California needs to understand the magnitude of this problem. Solix should provide parties with additional information regarding the number of unscannable correspondence so that more extensive proposals can be made in reply comments.

E. <u>Remedying other Issues</u>: What additional steps should Solix take when processing non-response data?

AT&T California recommends that the non-response data be analyzed by language in order to determine if the program needs to adjust its outreach efforts, or simply re-design or modify the text on the applications for certain customer segments. Any analysis of the non-response data by geographic region may also help evaluate whether outreach efforts should be modified.

F. <u>Synergies with other Commission Low-Income Programs</u>: How can the Commission tie California Lifeline in with other low-income programs? Is there some way that a customer can sign up for all low-income programs administered by the Commission at one time? Can a web-based system be a possible tool?

AT&T concurs that synchronizing the databases among the various Commission low-income programs can be a wonderful resource for connecting individuals with available benefits that they would otherwise not be aware of. However, such a project would be a massive undertaking considering how different the Commission's programs are. The following list contains examples of the varying elements of these programs:

- California Lifeline is available to residential customers only while the CARE program subsidizes residential single families, tenants of sub-metered residential facilities, qualified non-profit group living facilities, qualified agricultural employee housing facilities, and migrant farm worker housing centers.
- The income threshold for eligibility under Lifeline is lower than the CARE program.
- The CARE program's program-based criteria vary from California Lifeline's program.
- The Commission's energy programs are administered by each utility while California Lifeline is administered by Solix.

In order to properly evaluate whether a synchronized process can be administered, the Commission should consider input from each industry. As such, rather than conducting any further analysis in this proceeding, AT&T California proposes that a separate proceeding be initiated by the Commission to consider the synchronization of its low-income programs.

III. CONCLUSION

AT&T California respectfully urges the Commission to transition California Lifeline into a pre-qualification program in order to streamline the enrollment process. AT&T California also believes that modifying the program to pure program-based criteria through a well organized transition plan will improve efficiency without restricting access to all eligible consumers.

Dated at San Francisco, California, this 14th day of December 2007.

Respectfully submitted,

/s/ ANNA KAPETANAKOS DAVID DISCHER

> 525 Market Street, Rm. 2024 San Francisco, CA 94105 Ph: 415-778-1480

Fax: 415-543-0418

E-Mail: anna.kapetanakos@att.com

Attorneys for AT&T California

419551

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **OPENING COMMENTS OF AT&T CALIFORNIA (U 1001 C) ON ASSIGNED COMMISSIONER'S RULING SETTING SCOPE OF PHASE 2** on all known parties to **R.04-12-001**, by hand-delivery or by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official Service List, or by electronic mail and/or via messenger.

Executed this 14th day of December 2007, at San Francisco, California.

AT&T CALIFORNIA

525 Market Street San Francisco, CA 94105

/s/

Thomas J. Selhorst

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: R0412001 - CPUC-ILECS, CLECS -

FILER: CPUC - ILECS. CLECS LIST NAME: INITIAL LIST

LAST CHANGED: NOVEMBER 27, 2007

DOWNLOAD THE COMMA-DELIMITED FILE **ABOUT COMMA-DELIMITED FILES**

Back to Service Lists Index

Parties

JEFF SCHNUR SOLIX INC. 100 S. JEFFERSON ROAD PO BOX 902 WHIPPANY, NJ 07981

ROSS A. BUNTROCK WOMBLE CARLYLE SANDRIDGE & RICE PLLC 1401 EYE STREET, N.W. SEVENTH FLOOR WASHINGTON, DC 20005

OLIVIA B. WEIN
ATTORNEY AT LAW
NATIONAL CONSUMER LAW CENTER
1001 CONNECTICUT AVE., NW., STE. 510
RESTON, VA 20191 WASHINGTON, DC 20036

.....

SHARON THOMAS TECHNOLOGIES MANAGEMENT, INC. 210 N. PARK AVE. WINTER PARK, FL 32789

ERIN DAWLEY HORNITOS TELEPHONE COMPANY PO BOX 5158 MADISON, WI 53705-0158

KEVIN SAVILLE

ASSOCIATE GENERAL COUNSEL

CITIZENS/FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.

PETER GLASS
SEREN INNOVATIONS, INC.
15 SOUTH 5TH STREET, STE 500
MINNEAPOLIS, MN 55402 MOUND, MN 55364

KARL ANDREW REGULATORY AFFAIRS SAGE TELECOM, INC. 805 CENTRAL EXPRESSWAY SO, STE 100 600 HIDDEN RIDGE ALLEN, TX 75013-2789 IRVING, TX 75038

ALAN MASON VERIZON SERVICES ORGANIZATION, INC. HQE01E61

ALAN MASON VERIZON SERVICES ORGANIZATION, INC. HOE01E61 600 HIDDEN RIDGE IRVING, TX 75038

VERIZON WEST COAST VERIZON CALIFORNIA, INC. 600 HIDDEN RIDGE DR., E01E55 IRVING, TX 75038-2092

KRISTIE FLIPPO MARY PHARO

KAREN BAILEY

TIME WARNER CONNECT VAR TEC TELECOM, INC. 2805 DALLAS PKWY STE 140 1600 VICEROY DRIVE PLANO, TX 75093-8720 DALLAS, TX 75235

DAVID MORIARTY

DAVID MORIARTY

MEDIA ONE/AT&T BROADBAND

550 CONTINENTAL BLVD.

EL SEGUNDO, CA 90245

WOROVIA, CA 91016

JEFF COMPTION

VICE RESIDENT CARRIER RELATIONS

TELSCAPE COMMUNICATIONS INC.

606 EAST HUNTINGTON DRIVE

MONROVIA, CA 91016 JEFF COMPTON

DON EACHUS DON EACHUS
VERIZON CALIFORNIA, INC. CA501LB

JACQUE LOPEZ LEGAL ASSISTANT VERIZON CALIFORNIA INC 112 S. LAKE LINDERO CANYON ROAD
THOUSAND OAKS, CA 91362
THOUSAND OAKS, CA 91362
THOUSAND OAKS, CA 91362 THOUSAND OAKS, CA 91362

JESUS G. ROMAN
ATTORNEY AT LAW
VERIZON CALIFORNIA INC.
112 S. LAKEVIEW CANYON ROAD
112 LAKEVIEW CANYON ROAD, CA501LB
THOUSAND OAKS, CA 91362 THOUSAND OAKS, CA 91362

W. LEE BIDDLE
ATTORNEY AT LAW
FERRIS & BRITTON, P.C.
401 WEST A STREET, SUITE 1600
SAN DIEGO, CA 92101

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

JOY C. YAMAGATA

DALE DIXON JOY C. YAMAGATA

REGULATORY CASE MANAGER

SEMPRA UTILITIES

8330 CENTURY PARK COURT CP 32 D

SAN DIEGO, CA 92123

DALE DIXON
ATTORNEY AT LAW

VYCERA COMMUNICATIONS, INC.
12750 HIGH BLUFF DRIVE, SUITE 200
SAN DIEGO, CA 92129

THALIA R. GIETZEN

VYCERA COMMUNICATION, INC.

12750 HIGH BLUFF DR., STE.200

SAN DIEGO, CA 92130-2565

BRIAN PLACKIS CHENG

BLUE CASA COMMUNICATIONS
911 OLIVE STREET
SANTA BARBARA, CA 93101

ERIC WOLFE REGULATORY DUCOR TELEPHONE COMPANY PO BOX 42230 BAKERSFIELD, CA 93384-2230

DAVE CLARK KERMAN TELEPHONE COMPANY 811 S MADERA AVE. KERMAN, CA 93630

LINDA BURTON PO BOX 219 OAKHURST, CA 93644

DAN DOUGLAS THE PONDEROSA TELEPHONE CO. PO BOX 21 O'NEALS, CA 93645

CHRISTINE MAILLOUX

MARGARITA GUTIERREZ

ATTORNEY AT LAW

DEPUTY CITY ATTORNEY ATTORNEY AT LAW

THE UTILITY REFORM NETWORK

711 VAN NESS AVENUE, SUITE 350

SAN FRANCISCO, CA 94102

DEPUTY CITY ATTORNEY

CITY AND COUNTY OF SAN FRANCISCO

1 DR. CARLTON B. GOODLETT PLACE, RM. 375

SAN FRANCISCO, CA 94102

REGINA COSTA
RESEARCH DIRECTOR
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
SAN FRANCISCO, CA 94102
SAN FRANCISCO, CA 94102
SAN FRANCISCO, CA 94102-3214

GRETA BANKS
SENIOR ATTORNEY AT LAW
AT&T COMMUNICATIONS OF CALIFORNIA
AT&T SERVICES INC.
525 MARKET STREET, ROOM 2024
SAN FRANCISCO, CA 94105 SAN FRANCISCO, CA 94105

LOUIE DE CARLO COMPLIANCE MANAGER
MCI METRO ACCESS TRANSMISSION SERVICES
201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105

SAN FRANCISCO, CA 94105

GLENN STOVER

DARCY BEAL ASSOCIATE DIRECTOR AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR, 21
525 MARKET STREET, ROOM 1919
SAN FRANCISCO, CA 94105-2727
SAN FRANCISCO, CA 94105-2727

PETER M. HAYES DIRECTOR

ENRIQUE GALLARDO

LATINO ISSUES FORUM

160 PINE STREET, SUITE 700

SAN FRANCISCO, CA 94111

SAN FRANCISCO, CA 94111

SAN FRANCISCO, CA 94111

JOHN L. CLARK

ATTORNEY AT LAW

GOODIN MACBRIDE SQUERI DAY & LAMPREYLLP

505 SANSOME STREET, SUITE 900

SAN FRANCISCO, CA 94111

MARGARET L. TOBIAS

MARK P. SCHREIBER

MANDELL LAW GROUP, PC

THREE EMBARCADERO CENTER, SIXTH FL.

SAN FRANCISCO, CA 94111

MARK P. SCHREIBER

ATTORNEY AT LAW

COOPER, WHITE & COOPER, LLP

201 CALIFORNIA STREET, 17TH FLOOR SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL

ATTORNEY AT LAW

COOPER, WHITE & COOPER, LLP

201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

JOHN A. GUTIERREZ

DIRECTOR OF GOVERNMENT AFFAIRS

COMCAST CABLE COMMUNICATIONS, INC.

WESTERN DIVISION

12647 ALCOSTA BOULEVARD, SUITE 200 SAN RAMON, CA 94544

JOSEPHINE WONG APEX TELECOM INC. PO BOX 1917 OAKLAND, CA 94604 C. HONG WONG APEX TELECOM, INC. 113 10TH STREET OAKLAND, CA 94607

DOUGLAS GARRETT

KENECHUKWU OKOCHA

VICE PRESIDENT, WESTERN REGION REGULATOR THE GREENLINING INSTITUTE COX CALIFORNIA TELCOM, LLC, DBA COX COMM 1918 UNIVERSITY AVENUE, 2ND FLOOR 2200 POWELL STREET, SUITE 1035 BERKELEY, CA 94704 EMERYVILLE, CA 94608-2618

ROBERT GNAIZDA THALIA N.C. GONZALEZ
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

MELISSA W. KASNITZ

DISABILITY RIGHTS ADVOCATES

2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

LORRIE BERNSTEIN

PINNACLES TELEPHONE COMPANY
340 LIVE OAK ROAD
PAICINES, CA 95043-9998

EDWARD J SCHNEIDER, JR

FORESTHILL TELEPHONE CO., INC.

4655 QUAIL LAKES DR.

STOCKTON, CA 95207

LYNNE MARTIN

PAC-WEST TELECOMM, INC.

1776 MARCH LANE, SUITE 250

STOCKTON, CA 95207

LORRIE BERNSTEIN

MOSS ADAMS LLP
3121 WEST MARCH LANE, STE. 100
STOCKTON, CA 95219-2303

YVONNE SMYTHE
CALAVERAS TELEPHONE COMPANY
PO BOX 37
STOCKTON, CA 95229-2303

COPPEROPOLIS, CA 95228

GLOBAL VALLEY NETWORKS, INC.

515 KEYSTONE BLVD.

PATTERSON, CA 95363-8861

ROSE CULLEN
THE VOLCANO TELEPHONE COMPANY
PO BOX 1070
PINE GROVE, CA 95665-1070

REGULATORY MANAGER SUREWEST TELEPHONE PO ROY 969 LINDA LUPTON PO BOX 969 ROSEVILLE, CA 95678

JOLEEN HOGAN CAL-ORE TELEPHONE COMPANY PO BOX 847 DORRIS, CA 96023

JAMES LOWERS THE SISKIYOU TELEPHONE COMPANY PO BOX 157 ETNA, CA 96027

GAIL LONG TELEPHONE COMPANY HAPPY VALLEY/HORNITOS/WINTERHAVEN PO BOX 1566 OREGON, OR 97045

Information Only

ADRIENNE M. MERCER ADRIENNE M. MERCER

REGULATORY COMPLIANCE ANALYST
SAGE TELECOM, INC.

805 CENTRAL EXPRESSWAY S, STE 100

GREGORY T. DIAMOND
COVAD COMMUNICATIONS COMPANY
7901 LOWRY BLVD.
DENVER, CO 80230 ALLENT, TX 75013

GREGORY T. DIAMOND

ANDREW L. RASURA

BETTINA CARDONA

GOVERNMENT AND REGULATORY MANAGER
TCAST COMMUNICATIONS, INC.
24251 TOWN CENTER DR., 2ND FLOOR
VALENCIA, CA 91355

PRESIDENT
FONES 4ALL CORPORATION
6320 CANOGA AVE, SUITE 650
WOODLAND HILLS, CA 91367

ESTHER NORTHRUP

ESTHER NORTHRUP R SANCHEZ
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105
R SANCHEZ
BLUE CASA COMMUNICATION
911 OLIVE STREET
SANTA BARBARA, CA 93101 R SANCHEZ

GLENNDA KOUNTZ REGULATORY ASSISTANT KERMAN TELEPHONE CO. 811 S. MADERA AVENUE KERMAN, CA 93630

JULIE WEIGAND RICHARD HEATH AND ASSOCIATES, INC. 590 W. LOCUST AVENUE, SUITE 103 FRESNO, CA 93650

CAUSBY NELSONYA

MARGARET L. TOBIAS ATTORNEY AT LAW
AT&T SERVICE INC
525 MARKET STREET, SUITE 2025
SAN FRANCISCO, CA 94105

MARGARET L. TOBIAS
ATTORNEY AT LAW
MANDELL LAW GROUP, PC
THREE EMBARCADERO CENTER, SIXTH FLOOR
SAN FRANCISCO, CA 94110

ATTORNEY AT LAW

COOPER, WHITE & COOPER, LLP
201 CALIFORNIA ST., 17TH FLOOR
SAN FRANCISCO, CA 94111

ATTORNEY AT LAW

DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

SUZANNE TOLLER

ATTORNEY AT LAW

DAVIS WRIGHT TREMAINE LLP

505 MONTGOMERY STREET, SUITE 800

SAN FRANCISCO, CA 94120-7442 SAN FRANCISCO, CA 94111-6533

JESSE W. RASKIN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, 2ND FLOOR
BERKELEY, CA 94704

STEPHANIE CHEN
LEGAL ASSOCIATE
THE GREENLINING INSTITUTE
1918 UNIVERSITY STREET, 2ND FLOOR
BERKELEY, CA 94704

KEVIN KNESTRICK

DISABILITY RIGHTS ADVOCATES

2001 CENTER STREET, THIRD FLOOR

PEDWEIFV CA 94704-1204

CHARLES E. BOKN

MANAGER-STATE GOVERNMENT AFFAIRS

FRONTIER, A CITIZENS TELECOMMUNICATIONS
PO BOX 340 ELK GROVE, CA 95759

JOE CHICOINE MANAGER, STATE GOVERNMENT AFFAIRS FRONTIER COMMUNICATIONS PO BOX 340 ELK GROVE, CA 95759

State Service

CALIF PUBLIC UTILITIES COMMISSION FISCAL & ADMINISTRATIVE SERVICES AREA 3-B 505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3214

CHERRIE CONNER CALIF PUBLIC UTILITIES COMMISSION CALIF PUBLIC UTILITIES COMMISSION PROGRAM MANAGEMENT & IMPLEMENTATION BRAN UTILITY AUDIT, FINANCE & COMPLIANCE BRAN AREA 3-D 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

HAZLYN FORTUNE CALIF PUBLIC UTILITIES COMMISSION EXECUTIVE DIVISION ROOM 5303 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

JOSIE WEBB CALIF PUBLIC UTILITIES COMMISSION ENERGY DIVISION AREA 4-A 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

KATHERINE S. MOREHOUSE CALIF PUBLIC UTILITIES COMMISSION CALIF PUBLIC UTILITIES COMMISSION AREA 3-D 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

RISA HERNANDEZ CALIF PUBLIC UTILITIES COMMISSION CALIF PUBLIC UTILITIES COMMISSION ELECTRICITY RESOURCES & PRICING BRANCH EXECUTIVE DIVISION CALIF PUBLIC UTILITIES COMMISSION ROOM 4209 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

SEAN WILSON CALIF PUBLIC UTILITIES COMMISSION CALIF PUBLIC UTILITIES COMMISSION UTILITY AUDIT, FINANCE & COMPLIANCE BRAN PROGRAM MANAGEMENT & IMPLEMENTATION BRAN AREA 3-C 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

BENJAMIN SCHEIN CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN AREA 3-D 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

.....

DONNA L. WAGONER AREA 3-C 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

JESSICA T. HECHT CALIF PUBLIC UTILITIES COMMISSION DIVISION OF ADMINISTRATIVE LAW JUDGES ROOM 5113 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

KAREN JONES CALIF PUBLIC UTILITIES COMMISSION DIVISION OF ADMINISTRATIVE LAW JUDGES ROOM 2106 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

NATALIE BILLINGSLEY PROGRAM MANAGEMENT & IMPLEMENTATION BRAN TELECOMMUNICATIONS & CONSUMER ISSUES BRA ROOM 4108 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

> ROBERT HAGA ROOM 5304 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

TYRONE CHIN AREA 3-E 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3214

TOP OF PAGE BACK TO INDEX OF SERVICE LISTS